



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
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AUG 13 2009

REPLY TO THE ATTENTION OF: E - 19J

David Snyder
Environmental Program Coordinator
Federal Highway Administration
Ohio Federal aid Division
200 North High Street, Room 328
Columbus, Ohio 43215-2048

**Re: Comments on the Final Environmental Impact Statement
for the Cleveland Innerbelt Project, CEQ No. 20090264**

Dear Mr. Snyder:

In accordance with U.S. Environmental Protection Agency (EPA) responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act (CAA), we have reviewed the Final Environmental Impact Statement (FEIS) for the Cleveland Innerbelt Project in Cuyahoga County, Ohio.

The Cleveland Innerbelt's predominant function is to carry a major portion of the city's daily morning and evening commuting traffic to and from the central business district. The historically inadequate design is being modified to improve traffic flow at interchanges, and add a bridge that will complement a replacement of the existing aged structure crossing the Cuyahoga River.

EPA participated in early scoping and provided comments on the project Conceptual Alternatives December 11, 2006. Our May 21, 2009 comments on the project Draft Environmental Impact Statement (DEIS) recommended further consideration be given to:

- ♦ Stormwater runoff management;
- ♦ Greenhouse gases and climate change impacts;
- ♦ Transportation system management methods combined with proposed built solutions to reduce congestion along the Innerbelt right-of-way.

We commend Ohio Department of Transportation (ODOT) for specifying ODOT will follow its best management practices (BMP) in creating "green pretreatment" trenches, swales and detention sites for all segments of the project. Treated runoff from these constructs will be directed to the Cuyahoga River or Lake Erie or to local combined sewer systems. EPA encourages ODOT to continue negotiations with local agencies responsible for stormwater management (NEORS and TRANSWAC) and determine the best direction to channel effluent

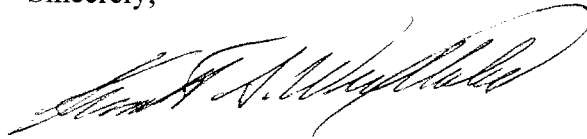
from the pretreatment constructs to reduce combined sewer overflows. We recommend the Record of Decision (ROD) commit to pretreating all project stormwater runoff plus maintain and monitor this system to sustain its ecological standard of function.

The FEIS discusses some concepts of climate change and the related impacts of greenhouse gases. EPA recommends consideration be given in the ROD for how the project will accommodate climate change, including the impacts of higher temperatures on bridge and road surface structural integrity. We also recommend discussion be included regarding planning adaptations for handling the impacts of increased rain and snowfall intensity to runoff design and sewer system capacities.

Specific Transportation System Management techniques (TSM) are listed in the FEIS for both construction and operation phases. We commend these steps and encourage the ROD to commit to adding other methods as technologies and funds become available.

Thank you for the opportunity to review and comment on the FEIS for the Cleveland Innerbelt Project. Should you have any questions regarding these comments, please feel free to contact me or Norm West of my staff at 312-353-5692 or west.norman@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Kenneth A. Westlake", written in a cursive style.

Kenneth A. Westlake, Supervisor
NEPA Implementation
Office of Enforcement and Compliance Assurance

Cc: Timothy M. Hill
Administrator, Office of Environmental Services
Ohio Department of Transportation
1980 West Broad Street
Columbus, Ohio 43223